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IN THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 (SAN JOSE DIVISION)

CENTER FOR BIOLOGICAL DIVERSITY,  
 et al.,

Plaintiffs,

v.

BUREAU OF LAND MANAGEMENT, et  
 al.,

Defendants,

and

SALINAS RAMBLERS MOTORCYCLE  
 CLUB, et al.,

Defendant-Intervenors

Case No: 5:04-cv-4736-JF

**STIPULATED REQUEST FOR  
 ORDER CHANGING TIME  
 PURSUANT TO CIV. L.R. 6-2**

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Assistant Attorney General  
2 United States Department of Justice  
Environment and Natural Resources Division  
3 JEAN E. WILLIAMS, Chief  
LISA L. RUSSELL, Assistant Chief  
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**STIPULATION**

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs, Center for Biological Diversity, et al., and Federal Defendants, Bureau of Land Management, et al., respectfully request that this Court alter Plaintiffs' deadline for filing an attorneys' fees motion, from September 8, 2006, to October 13, 2006.

On August 31, 2006, the Court issued an Order granting Plaintiffs' request for an extension for an enlargement of time to file a motion for attorneys fees and set a deadline of September 8, 2006, for Plaintiffs' to file a motion for attorneys' fees. See Order (Dkt. #148). In light of the strong public policy in encouraging settlement of attorneys' fees, see Hensley v. Eckerhart, 461 U.S. 424, 437 (1983) ("Ideally, of course, litigants will settle the amount of a fee."); Gisbrecht v. Barnhart, 535 U.S. 789, 801-02 (2002) (same); McDermott, Inc. v. AmClyde, 511 U.S. 202, 215 (1994) ("public policy wisely encourages settlement"), Plaintiffs and Defendants have conferred and agreed to enter into settlement discussions over Plaintiffs' entitlement to and amount of any attorneys' fees award in this case. Accordingly, in order to afford the Parties an opportunity to engage in meaningful settlement discussions, the Parties respectfully request that the Court alter the deadline established in its August 31, 2006, Order, from September 8, 2006 until October 13, 2006.

Dated: September 1, 2006

Respectfully Submitted,

/s/ Brian Litmans  
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Dated: September 1, 2006

Respectfully submitted,

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PURSUANT TO STIPULATION, IT IS SO ORDERED,

JEREMY FOGEL



Dated: 9/5/06

United States District Judge